

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

SHONDELL DAYE and DEIDRA LUCAS, )

Plaintiffs, )

v. )

Case No. \_\_\_\_\_

CRETE CARRIER CORPORATION, )  
SONYA BRIDGES, JOHN DOE 1-3 and )  
XYZ CORPORATIONS 1-3, )

Defendants. )

---

**NOTICE OF REMOVAL**

TO: The Judges of the United States District Court for the Northern District of Georgia

The Defendants, Crete Carrier Corporation and Sonya Bridges, respectfully show the Court the following:

1.

A civil action has been brought against the Defendants in the State Court of Gwinnett County, State of Georgia, by the above named Plaintiffs, said action being designated as Civil Action No. 23-C-01361-S3. Said action seeks recovery of an amount in excess of \$75,000.00. The conclusion that the amount in controversy in this action is in excess of \$75,000.00 is based on Plaintiffs' allegations in the

Complaint that they are entitled to recover special damages in an amount in excess of \$75,000.00.

2.

The Plaintiffs are now, and were at the commencement of this suit and at all times since, citizens and residents of the State of Georgia.

3.

Defendant Crete Carrier Corporation, a Nebraska corporation, is now, and was at the time of the commencement of this suit and at all times since, a corporation organized and existing under the laws of the State of Nebraska, having its principal place of business in Lincoln, Nebraska. Defendant Crete Carrier Corporation agrees and consents to the removal of this action to Federal Court.

4.

Defendant Sonya Bridges is now, and was at the commencement of this suit and at all times since, a citizen and resident of the State of Florida. Defendant Bridges agrees and consents to the removal of this action to Federal Court.

5.

The Defendants attach hereto a copy of the Summons and Complaint (as served on the Defendants) filed in the State Court of Gwinnett County, Georgia marked as Exhibit "A"; a copy of Plaintiffs' First Interrogatories, Requests for

Production of Documents, and Request for Admissions to Defendant Crete Carrier Corporation marked as Exhibit “B”, a copy of Plaintiffs’ First Interrogatories, Requests for Production of Documents, and Request for Admissions to Defendant Sonya Bridges marked as Exhibit “C”, Affidavit of Service Upon Crete Carrier Corporation marked as Exhibit “D”; Affidavit of Non-Service on Sonya Bridges marked as Exhibit “E”, and a copy of the Defendants’ Answer to Plaintiffs’ Complaint marked as Exhibit “F”.

6.

Now, within thirty (30) days after receipt of the Summons and Complaint, Defendants file this their Notice of Removal of said action to this Court.

7.

This action is removable by reason of diversity of citizenship of the parties and the fact there is more than \$75,000.00 in controversy, exclusive of interest and costs.

WHEREFORE, the above-named Defendants Crete Carrier Corporation and Sonya Bridges file this their Notice of Removal of said cause to this Court.

Respectfully submitted this 31<sup>st</sup> day of March, 2023.

WEBB, ZSCHUNKE, NEARY  
& DIKEMAN, LLP

/s/ Marvin D. Dikeman

MARVIN D. DIKEMAN  
Georgia State Bar No. 221760  
BRIAN J. MILLER  
Georgia State Bar No. 211035

*Attorneys for Defendants*

One Ameris Center, Suite 1210  
3490 Piedmont Road, N.E.  
Atlanta, Georgia 30305  
Tel. 404-264-1080  
Fax 404-264-4520  
[mdikeman@wznd.net](mailto:mdikeman@wznd.net)  
[bmiller@wznd.net](mailto:bmiller@wznd.net)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing **NOTICE OF REMOVAL** (prepared in Times New Roman 14 point font) with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

Nathan A. Kratzert, Esq.  
Mark A. Molina, Esq.  
Montlick & Associates, P.C.  
17 Executive Park Drive, Suite 300  
Atlanta, GA 30329  
[nkratzert@montlick.com](mailto:nkratzert@montlick.com)  
[mmolina@montlick.com](mailto:mmolina@montlick.com)

This 31<sup>st</sup> day of March, 2023.

/s/ Marvin D. Dikeman  
MARVIN D. DIKEMAN  
Georgia State Bar No. 221760

***Attorney for Defendants***

WEBB, ZSCHUNKE, NEARY & DIKEMAN, LLP  
One Ameris Center, Suite 1210  
3490 Piedmont Road, N.E.  
Atlanta, Georgia 30305  
Tel. 404-264-1080  
Fax 404-264-4520  
[mdikeman@wznd.net](mailto:mdikeman@wznd.net)